

**To: Ms. Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
425 12th St. SW
Washington, DC 20554**

**Re: NCTA (012919 18-336 Ex Parte) / National Suicide Hotline Improvement Act
02/01/2019**

Ms. Dortch,

On behalf of the Department of Veterans Affairs I would like to reply to comments submitted by Mr. Steven F. Morris of NCTA (012919 18-336 Ex Parte.pdf).

NCTA states that if an N11 solution is used, a relevant factor in designating which N11 should be repurposed is the *“level of usage of such numbers”*. NCTA goes on to assume that *“the more heavily (an N11) is used today, the greater the consumer education and outreach that will be necessary”* to inform existing callers of the change to ensure *“efficient use of the number for its new purpose”*. I have concerns with these assumptions as follows:

Relevant factor – *“level of usage”*. Level of Usage is not necessarily a relevant factor in reaching decision to repurpose an N11. Of the 4 N11’s studied:

1. 211 is advertised in different ways in different communities. As a public service device often utilized by diverse segments in a community, one could say that it’s most profound purpose is serving those living in poverty. While the call volume may not match 611, the impact on quality of life for those in poverty has no comparison with 611.
2. 311 is still growing. Anne Arundel County Maryland (my home) recently implemented 311. 311 is typically implemented as 911 becomes overburdened with non-emergent calls for community service. Since this Public Service device is still in a growth state, current call counts may not be relevant.
3. 511 by its designed purpose would not be expected to have large call volume. The low call counts are likely reflective of the fact that 511 would only be accessed while someone is on the highway. Also, 511 has recently started to expand its use with Amber Alert highway messaging. This will likely add to call counts in the future, so as with 311, current call counts may not be relevant.
4. 611, while more heavily used, is the only one not used as a Public Service Device (see below) but instead as a Customer to Service Provider convenience number. I believe a study probably should have looked at the number of calls for

Service and Sales using 611 as a percentage of total customer contacts through 800 #s, web chats, apps or other mechanisms to communicate with a Carrier.

- a. My statement in #4 above assumes that a “Public Service Device” should not be used for Competitive Advantage or Sales/Profit.
- b. Also, that a Public Service Device can be advertised in Public Service Announcements (PSA). A PSA for 611 would need to explain that 611 only calls to the Carrier associated with the device you are calling from.
- c. If you want to call a new Carrier about switching service, you will not be able to reach the new Carrier using 611 from your existing phone.
- d. If you want service on an existing non-working device, 611 will only work if you call from another device connected to the same Carrier.

“The more heavily (an N11) is used today, the greater the consumer education and outreach that will be necessary”:

1. 211 – in poverty settings knowledge of 211 is likely person to person. Either a Social Worker referring a Client or one Client telling another how to get help. It is also on posters, in clinics, shelters and busses. Using direct mail and media to educate the people using 211 will not work.
2. 311 – public education may be accomplished by community specific PSA’s but current successes in communities where 311 has been implemented to offload 911 for true emergencies would likely be lost if the PSA directed callers to an 800# instead of 311.
3. 511 – Most 511 PSA advertising is on highway signage and in rest areas. Ensuring that all of the signs and advertising points are addressed nationwide would likely be ineffective. While 511 may eventually be outdated by technology (not factoring the recent addition of use for Amber Alerts), mechanisms for public education would be challenging and need more study.
4. 611 – There have not been PSAs ever since the Telecom Industry became a competitive marketplace, so the only way consumers know about 611 is direct advertising / marketing from their Carrier.
 - a. Given that this is a closed loop relationship, customer education is much easier and becomes a new marketing opportunity for Carriers.
 - b. Also, since when the customers device is not working they must use another device, possibly from another Carrier, all carriers offer already existing, published and marketed 800 #s to call in from any device.
 - c. Carriers also have well established non-Telephonic mechanisms in place for billing and marketing through mail, email, text, web pages, as well as social media to educate the customers that are using 611 currently.
 - d. During an aging period after the N11 is taken out of service and while concurrent planning is in process to re-purpose 611 for Suicide Prevention, the Carriers can use an intercept recording specific to their customers to give their already established 800 # to call for Service, Sales or questions.

Lastly, “Efficient use of the number for its new purpose”, I assume, is referring to the inevitable calls that will occur from those who miss the consumer messages on the repurposing of the N11 regardless of educational efforts.

1. While 611 is likely to have the most effective mechanisms for education, there will still be some calls to Suicide Prevention that are looking for a totally different kind of help.
2. This gap will be filled to a large part by the fact that the current National Suicide Prevention Lifeline (the target for the new N11 calls) is already answered by an IVR directing callers to “Press 1 for the Veterans Crisis Line”.
3. If that greeting doesn’t stop the caller, an option can be added to “press 2” for more of an explanation, which can be the final step of consumer education.

Of course, this discussion ignores the fact that 211, 311 & 511 were all assigned for specific Public Service Uses where 611 has not been assigned by the FCC. The FCC has stated that “N11 Codes that have not been assigned by the Commission can continue..., **“PROVIDED THAT SUCH USE CAN BE DISCONTINUED ON SHORT NOTICE.”** (Specifically referring to 411 & 611)

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8. To date, the Commission has assigned the 211 for information and referral services, 311 for non-emergency police and other governmental services, 511 for travel and information services, 711 for telephone relay services for the hearing impaired, and 911 as the national emergency number.²⁶ In addition, 411, 611 and 811 are widely used by carriers, but have not been assigned by the Commission for nationwide use.²⁷ N11 codes that have not been assigned nationally can continue to be assigned for local uses, provided that such use can be discontinued on short notice.

Thank you for your consideration,

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